

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** AT&T Communications of New England, Set #1

**DATED:** August 10, 2001

**ITEM:** ATT-VZ 1-1 Please identify and provide, pursuant to a mutually agreeable protective agreement, a list of all companies in the "COMPANY ID" field referenced in your response to AG-VZ 2-5, part g.

**REPLY:** The requested data are the confidential and proprietary information of the CLECs that may not be disclosed by Verizon MA without the CLEC's authorization. The information is, accordingly, being provided only to the Department and to those parties to whom the CLECs authorize disclosure.

Please see Attachment 1 which provides a list of all of the CLECs that appear in the "COMPANY ID" field referenced in the Company's response to AG-VZ 2-5, part g. The list does not include Verizon MA, wireless carriers or independent telephone companies.

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**ITEM:** ATT-VZ 1-2 Please refer to the E911 documentation found at the internet site identified in Verizon's response to AG-VZ 2-5, part e, and specifically to the VERIZON REGIONAL E911 PS/ALI GUIDE, which lists the following classes of service to be identified for each listing in the E911 database:

- 1 - Residence
- 2 - Business
- 3 - Residence Private Branch Exch (PBX)
- 4 - Business PBX
- 5 - Centrex
- 6 - Coin - one way
- 7 - Coin - two way
- 8 - Mobile
- 9 - Off-premise extension, Residence
- 0 - Off-premise extension, Business

- a) Please provide, pursuant to a mutually agreeable protective agreement, a list of the companies in the E911 database which provide each of the foregoing classes of service.
- b) Please provide the total number of companies which have listings for each of the foregoing classes of service.

**REPLY:** a. The requested data are the confidential and proprietary information of the CLECs that may not be disclosed by Verizon MA without the CLEC's authorization. The information is, accordingly, being

**REPLY:** ATT-VZ 1-2  
(cont'd)

provided only to the Department and to those parties to whom the CLECs authorize disclosure.

Please see Attachment 1 which provides a list of all of the CLECs that have E911 listings that carry each of the classes of service referenced above. The list does not include Verizon MA, wireless carriers or independent telephone companies.

- b. Verizon considers certain data responsive to this request proprietary and competitively sensitive. The data will be made available to the extent provided for in a mutually agreeable Protective Agreement.

Please see Attachment 2 which provides a count of all of the CLECs that have E911 listings that carry each of the classes of service referenced above. The count does not include Verizon MA, wireless carriers or independent telephone companies.

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**ITEM:** ATT-VZ 1-3 Based on your knowledge of the E911 rules requiring the listing of telephone numbers in the E911 database, please state whether a telecommunications provider in the following hypothetical situations is required to register a telephone number in the E911 database:

- a) Telecommunications provider provides local and long distance service from its own switch to an end-user with a PBX switch over facilities obtained from Verizon pursuant to Verizon's special access tariffs (calls can originate from the end-user);
- b) Telecommunications provider provides mobile wireless service from its own switch to an end-user customer who can originate calls on that customer's number;
- c) Telecommunications provider provides payphone service to the public using lines leased from Verizon.

Please explain your answers and cite to and provide copies of all documentation that supports your answer.

**REPLY:** Verizon MA objects to this request to the extent it seeks a legal opinion as to the interpretation of state and federal statutes and rules which set forth the requirements for other carriers to list telephone numbers in a E911 database. Specifically, the legal requirements for carriers relating to the provision of E911 in Massachusetts are contained in M.G.L. c. 166§14A, 560 C.M.R. § 2.00, and FCC rules.